

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (a.k.a. PETER CHO,
ET AL.,

Defendants.

Civil Action No.: 2:23– cv-3709

Document Electronically Filed

Motion Day: November 6, 2023

**NOTICE OF DEFENDANT BIOSURE GLOBAL, LTD.'S
MOTION TO DISMISS**

LADDEY, CLARK & RYAN, LLP
Thomas N. Ryan (018951985)
Thomas J. White (320372020)
60 Blue Heron Road, Suite 300
Sparta, New Jersey 07871-2600
Telephone: (973) 729-1880;
Facsimile: (973) 729-1224
tryan@lcrlaw.com
twhite@lcrlaw.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global, Ltd.*

BRADLEY ARANT BOULT CUMMINGS LLP
Jason E. Fortenberry (*pro hac vice*)
Jonathan M. Barnes (*pro hac vice*)
188 East Capitol Street, Suite 1000
Post Office Box 1789
Jackson, Mississippi 39215-1789
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
jfortenberry@bradley.com
jbarnes@bradley.com

Jeffrey D. Dyess (*pro hac vice*)
Benn C. Wilson (*pro hac vice*)
1819 5th Avenue North
Birmingham, Alabama
Telephone: (205) 521-8000
Facsimile: (205) 521-8800
jdyess@bradley.com
bcwilson@bradley.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global, Ltd.*

PLEASE TAKE NOTICE that on November 6, 2023 or as soon thereafter as counsel may be heard, Defendant Biosure Global, Ltd., by and through his counsel, shall move to dismiss all claims in Plaintiff Trutek Corp.'s Complaint asserted against it under Federal Rule of Civil Procedure 12(b)(2) and 12(b)(6). In support thereof, Biosure Global, Ltd. incorporates by reference its memorandum in support filed contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that the movant requests the matter be decided on the papers.

Pursuant to Local Civ. Rule 7.1(e), a copy of the proposed Order is annexed hereto.

Dated: October 2, 2023

Respectfully submitted,

LADDEY, CLARK & RYAN, LLP

BRADLEY ARANT BOULT CUMMINGS LLP

BY: /s/ Thomas J. White

Jason E. Fortenberry (*pro hac vice*)

Thomas N. Ryan (018951985)

Jonathan M. Barnes (*pro hac vice*)

Thomas J. White (320372020)

188 East Capitol Street, Suite 1000

60 Blue Heron Road, Suite 300

Post Office Box 1789

Sparta, New Jersey 07871-2600

Jackson, Mississippi 39215-1789

Telephone: (973) 729-1880;

Telephone: (601) 948-8000

Facsimile: (973) 729-1224

Facsimile: (601) 948-3000

tryan@lclrlaw.com

jfortenberry@bradley.com

twhite@lclrlaw.com

jbarnes@bradley.com

Attorneys for Defendants Salvacion, USA, Inc.; Salvacion Co., LTD.; Yeong Wan Cho (aka Peter Cho); Salvacion R&D Center; Salvacion International, LLC; Sei Young Yun; Biosure Global, Ltd.

Jeffrey D. Dyess (*pro hac vice*)

Benn C. Wilson (*pro hac vice*)

1819 5th Avenue North

Birmingham, Alabama

Telephone: (205) 521-8000

Facsimile: (205) 521-8800

jdyess@bradley.com

bcwilson@bradley.com

Attorneys for Defendants Salvacion, USA, Inc.; Salvacion Co., LTD.; Yeong Wan Cho (aka Peter Cho); Salvacion R&D Center; Salvacion International, LLC; Sei Young Yun; Biosure Global, Ltd.

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that, on this day, the foregoing document was filed with the Clerk of the Court through the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: October 2, 2023

Respectfully submitted,

LADDEY, CLARK & RYAN, LLP

BY: /s/ Thomas J. White

Thomas N. Ryan (018951985)

Thomas J. White (320372020)

60 Blue Heron Road, Suite 300

Sparta, New Jersey 07871-2600

Telephone: (973) 729-1880;

Facsimile: (973) 729-1224

tryan@lclaw.com

twhite@lclaw.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global, Ltd.*